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NO DATE



LONGVIEW FIBRE COMPANY

5901 EAST MARGINAL WAY SOUTH
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SEATTLE, WASHINGTON 98124
206-762-7170 FAX 206-767-2442

Elaine L. Spencer
Bogle and Gates
Two Union Square
601 Union Street
Seattle, Wa. 98101- 2322

Dear Ms. Spencer,

At your request, I have provided the documentation concerning the removal of the underground tank used for oil to run the boiler. The information is also provided on the replacement of the tank with an above ground tank. The laws concerning removal of the tanks, pipes, etc. are also involved and provided.

The records concerning my expertise on boiler operations, and more to the point, burner functions are provided.

The daily records of boiler operations and checks are provided.

My licenses and those required, inspected by, along with certification by the factory Mutual Insurance Company are here. Also the Seattle Fire Department permits to allow the operation of the boiler with fuel storage above ground.

Following is a brief summary of the events as they occurred and the people involved.

Items included:

1. Copy of File on Tank Replacement
2. Copy of correspondence from Longview 1985/1986 on Regulation of underground storage tanks
3. Monitor of oil tanks and ground wells
4. Longview decision to remove underground tanks (May 20, 1987).
5. CH2M Hill hired to supervise removal
6. Bids received from three companies in July of 1987

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7. Decision to go with O'Sullivan
8. Start removal of three tanks on August 3, 1987
9. First two tanks removed with little trouble. All pipes removed with tanks. Backfilled.
10. Bunker C tank removed. Some contaminated soil found. Extra work for O'Sullivan to remove and backfill (charge orders)
11. Hole filled in and asphalt replaced on top
13. CH2M Hill supervised project until completed. Department of Ecology present.
14. Tank is cleaned and hauled off.
15. Test wells are installed in various locations around where tanks are removed. Monitoring these still continues with CH2M Hill. (See report from CH2M Hill on March 16, 1988)
16. Wells monitored continually and in November 1988, decision made to install an above tank for standby fuel.
17. Contract awarded to Fuel Tank Installation Company (see Bid and Contract) Tank bought and installed per Fire Department codes. Inspected and tested by Seattle Fire Department. Tank hooked up to above ground pipe and pumped to boiler by Longview.

System tested on oil for four hour by licensed operator and city inspector, also licensed boiler supervisors. System runs well with correct fuel usage.

The return pump had been removed and capped at boiler end. From November 1988 through 1990, the test wells were monitored per requirements by CH2M Hill and the Department of Ecology.

In February 1990 the wells checked clean. This continued until the winter of 1990. During December 1990, Longview was curtailed for four days by Washington Natural Gas. Up until this time, the oil system had been tested on a semi-annual basis for four hours each time by licensed operators. Everything checked out okay.

Fuel consumption was normal.

During the four days of running, the boiler ran well and the fuel/air mixture checked okay. On the second day a difference of stored fuel level became noticeable, but not alarming. We used a fuel combustion analyzer to check burner combustion. Everything was okay. On the fourth day we went back on Washington Natural Gas.

The fuel was checked and was found to be less than it should have been.

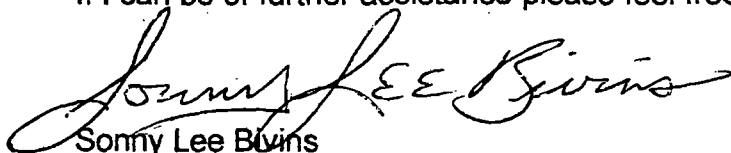
Longview double-checked everything on the burner controls. At this time we checked the burner recycle pressure line. It is used only when the burner idles and not all the fuel is needed. It is recycled around the feed line. One line off of this returned underground to the underground tank for Bunker C. It was used to keep warm oil circulating as Bunker C is normally very thick.

We traced it back to the location of the old tank and assumed that the diesel had leaked into the ground. We sealed the pipes off and cut them off at floor level at the boiler. It did not affect the burner operation when tested.

The diesel was discovered in the test well in the next few months. In lated 1992, Church Construction was contracted to dig up the contaminated soil. At that time, the exposed pipes, that had been left torn and hanging, were capped off and the contaminated soil removed. The amount of oil that would of been in the pipes from just disconnecting would have been in excess of 300 gal.

New soil was placed and the tank reconnected. The system now runs without oil running out into the soil. All tests continue at this time and everything is running smoothly with no noticeable oil in the test wells.

If I can be of further assistance please feel free to contact me .



Sonny Lee Bivins
Maintenance General Foreman
Seattle Longview Fibre